

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC.
LITIGATION

) Civil Action No. 04-10294-DPW
) (Lead Case)

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THIS DOCUMENT RELATES TO:
ALL CASES

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**LEAD PLAINTIFF'S MOTION TO FILE THE
AFFIDAVIT OF JOHN F. MYKLUSCH UNDER SEAL**

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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Lead Plaintiff BPI Global Asset Management LLP (“Lead Plaintiff”) will, and hereby does move the Honorable Douglas P. Woodlock, United States Courthouse, 1 Courthouse Way, Boston, Massachusetts, for an Order: (1) permitting Lead Plaintiff to file under seal the Affidavit of John F. Myklusch and the attached exhibits, which is to be filed on March 9, 2007 pursuant to the oral directive of the Court and the Electronic Clerk’s Notes for proceedings held before Judge Woodlock on February 28, 2007; and (2) providing that the Affidavit and attached exhibits shall not be made available for public inspection except by Order of the Court.

This motion is made pursuant to Local Rule 7.2 and the Stipulated Protective Order Concerning Disclosure of Confidential Information (the “Protective Order”), filed December 26, 2006. Docket No. 178. This motion is further based upon this Notice of Motion and Motion, the following memorandum of points and authorities, and all other pleadings and papers on file in this action.

MEMORANDUM OF POINTS AND AUTHORITIES

At the hearing on Lead Plaintiff’s motion for class certification conducted February 28, 2007, the Court directed Lead Plaintiff to submit by March 9, 2007 an affidavit concerning Lead Plaintiff’s equity participation in certain limited partnerships where it was also the general partner. The affidavit Lead Plaintiff will submit on March 9, 2007 attaches and refers to four (4) private placement memoranda, a summary of one of the offerings, and four (4) limited partnership agreements, which contain confidential and proprietary information subject to protection under Federal Rule of Civil Procedure 26(c)(7) and which documents were designated

“CONFIDENTIAL” pursuant to the Protective Order. Accordingly, good cause exists for an Order permitting the affidavit to be filed under seal.

For the foregoing reasons, Lead Plaintiff requests that the Court enter an Order: (1) permitting Lead Plaintiff to file under seal the Affidavit of John F. Myklusch and attached exhibits, which is to be filed on March 9, 2007; and (2) providing that the Affidavit and attached exhibits shall not be made available for public inspection except by order of the Court.

Dated: March 8, 2007

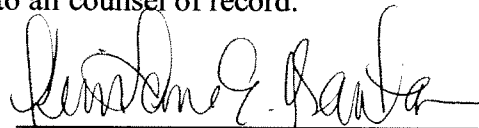
GOLD BENNETT CERA & SIDENER LLP

By: /s/Solomon B. Cera
Solomon B. Cera

Attorneys for Lead Plaintiff
BPI Global Asset Management LLP

CERTIFICATE OF SERVICE

I, KimLane E. Gantan, hereby certify that on March 8, 2007, I electronically filed the foregoing document: **“LEAD PLAINTIFF’S MOTION TO FILE THE AFFIDAVIT OF JOHN F. MYKLUSCH UNDER SEAL”** with the Clerk of the Court using the CM/ECF System which sent notification of such filing to all counsel of record.

A handwritten signature in black ink, appearing to read "KimLane E. Gantan", is written over a horizontal line.

KimLane E. Gantan